

## **Comments on Proposition 84 Guidelines**

### **Region Acceptance Process**

The guidelines for the region acceptance process should be developed to be consistent with the Department of Water Resources' prior standing. The guidelines should be clear, facilitate collaboration, and avoid duplicative or overlapping efforts.

With this concept in mind, the guidelines for region acceptance should not apply to IRWM regions that have already been established and accepted by the Department of Water Resources, developed an adopted IRWM Plan, and awarded Proposition 50 grant funds. These regions were, in part, formed through the direction of the Department of Water Resources and required considerable effort to coalesce into the now established regions. Therefore, these prior regions should not be undone and made to compete with non-established groups. Instead, the established regions can apply their limited resources to planning and project implementation.

Previously established regions should be maintained as a whole. While some of these regions may be large and diverse, the regions have addressed these factors through their governance structure and their support for ongoing planning at the subregional level. For example, in the Greater Los Angeles County Region, the governance structure includes five Subregional Steering Committees which each play an integral role in the development of the Region's IRWMP. Each Subregional Steering Committee holds routine meetings with its area's stakeholders (water supply, flood control, water quality, open space, etc.) to develop, plan, and prioritize their subregional needs and projects. These Steering Committees meet as often as necessary to discuss their subregion's characteristics, needs, and challenges. This process helps to ensure the most effective projects are selected by each subregion in order to plan effectively for their area on an ongoing basis.

Regions should also continue to be required to gather input from all stakeholders to ensure they are obtaining pertinent information and addressing issues from all areas, including: open space, sanitation, stormwater, surface water, water supply, and flood control.

### **Funding Areas**

Funding areas for Proposition 84 contain multiple IRWM regions. While cooperation and discussion is important within and among regions, it is important to recognize that resolution to funding issues may not always be possible. The guidelines should include language to designate Prop 84 grant funding for regions to be consistent with the Proposition's funding mechanism of a fixed base allocation with a variable amount based on population.

### **Funding for Administration Costs**

The guidelines should include a mechanism to provide IRWM areas with funding for administration costs that would be provided early in the funding process. While planning grants are available early for the development and updating of IRWM plans, additional work is necessary for IRWM administration and project planning. This work includes coordination between the agencies; preparation of MOUs, agreements, and contracts; and various reporting requirements. The majority of this work is conducted prior to project construction; therefore, the work should not be included within the project costs for reimbursement. Instead, funding should be provided up front based on a percentage of the funds for project implementation, similar to the Department of Water Resources' administration costs.

### **Flood Management**

Provide an estimate on when the "Strategies that Improve Flood Management" are expected to be completed and included in the Resource Management Strategies.

Emphasize that the Flood Management element in the existing IRWMP Plans are weak and need to be more comprehensive.

Provide a detailed explanation on how the Flood Management Element in the updated IRWM Plan (as part of the Prop 84 with a maximum of \$1 million for planning) is related to the Regional Flood Management Plan (as part of the Prop 1E with a maximum of \$1 million for planning).

Indicate the specific differences between the two plans and how they will roll up into the California Water Plan.

### **Planning and Implementation Funds**

We support keeping the Prop 84 and 1E funding separated and having a separate application process for each funding source. If the application process is to be combined, provide specific details on how the process will work.

If the implementation funds are available soon after the planning funds, specify if an IRWMP Group can apply for both planning and implementation grants at the same time.